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16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 TRUSTEES OF THE ELECTRICAL
19 WORKERS HEALTH AND WELFARE
20 TRUST; TRUSTEES OF THE
21 ELECTRICAL WORKERS PENSION
22 TRUST; AND TRUSTEES OF THE LAS
23 VEGAS ELECTRICAL JOINT
24 APPRENTICESHIP AND TRAINING
25 TRUST FUND,

26 Case No. 2:12-cv-00812-MMD-PAL

27 **STIPULATED/CONSENT JUDGMENT**

28 Plaintiffs,

vs.
WILLIAMS BROTHER, INC., a Nevada
corporation,

Defendant.

Williams Brother, Inc. ("Williams"), hereby stipulates and consents to entry of judgment
in favor of Plaintiffs, Trustees of the Electrical Workers Health and Welfare Trust, Trustees of the
Electrical Workers Pension Trust, and Trustees of the Las Vegas Electrical Joint Apprenticeship
and Training Trust Fund (collective "Trust Funds"), and against Williams in the total sum of

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\$32,785 for delinquent employee benefit contributions and related costs and fees owed under the
Employee Retirement Income Security Act of 1974 ("ERISA").

The parties have stipulated and therefore the Court finds:

1. Williams is signatory to and bound by the terms of a collective bargaining agreement ("CBA") with the International Brotherhood of Electrical Workers Local No. 357 ("Union"), in which Williams agreed to abide by the trust agreements establishing the respective Trust Funds and any amendments thereto ("Trust Agreements").

2. Under the CBA and the Trust Agreements, Williams is obligated to pay employee benefit contributions to the Trust Funds on behalf of Williams's bargaining unit employees represented by the Union.

3. Based on a contract compliance review ("Audit") for the period of September 1, 2009, through May 31, 2012, Williams owes the Trust Funds \$32,785, which includes employee benefit contributions, liquidated damages, interest, audit fees, and attorney's fees to date.

4. This Stipulated/Consent Judgment is entered into by and between Williams and the Trust Funds for employee benefit contributions and related costs and fees owed to the Trust Funds by ERISA.

Dated: December 14, 2012

BROWNSTEIN HYATT FARBER
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Attorneys for Plaintiffs


Dated: November 11, 2012

WILLIAMS BROTHER, INC., a Nevada
corporation


Name: Michael Poehl
Title: President
Telephone: _____
Facsimile: _____

JUDGMENT

1
2 Judgment is hereby entered against Williams Brother, Inc., a Nevada corporation and in
3 favor of the Trustees of the Electrical Workers Health and Welfare Trust, Trustees of the
4 Electrical Workers Pension Trust, and Trustees of the Las Vegas Electrical Joint Apprenticeship
5 and Training Trust Fund in the amount of \$32,785.

6
7 Dated this 12th day of February, 2013.



U.S. DISTRICT COURT JUDGE

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101

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1 STATE OF NEVADA)
2 COUNTY OF CLARK) SS.
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4 MICHAEL PECK, being first duly sworn, deposes and says:
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6 That he/she is the Pres. of Williams Brother, Inc., a Nevada corporation, and is
7 duly authorized to execute this document; that he/she has read the foregoing Stipulated/Consent
8 Judgment and knows the contents thereof; that the same is true of his/her own knowledge, except
9 for those matters therein stated on information and belief, and as to those matters he/she believes
10 them to be true.


11

Affiant

12 Subscribed and Sworn to before me
13

14 this 11th day of Dec, 2012.
15 
16 - Notary Public -

17 My commission expires:

